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Indirect Purchaser Plaintiffs and
Counsel for Brian Luscher*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. CV-07-5944-SC;
No. CV-13-03234-SC

MDL No. 1917

This Document Relates to:
ALL INDIRECT PURCHASER ACTIONS;
*Luscher et al. v. Videocon Industries Limited,
et al.*

**DECLARATION OF SYLVIE K. KERN IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' ADMINISTRATIVE MOTION
TO SEAL PORTIONS OF FIRST AMENDED
COMPLAINT**

1 I, Sylvie K. Kern, declare:

2 1. I am an attorney duly licensed by the State of California and admitted to practice
3 before this Court. I am a principal of KAG Law Group and one of the attorneys representing the
4 Indirect Purchaser Plaintiffs ("Plaintiffs") in the above-captioned actions. The matters set forth
5 herein are within my personal knowledge and if called upon and sworn as a witness I could
6 competently testify regarding them.

7 2. I submit this Declaration in support of Plaintiffs' motion to file portions of their First
8 Amended Complaint ("FAC") under seal pursuant to Civil Local Rules 7-11 and 79-5(d).

9 3. The FAC contains excerpts from and/or statements derived from documents and
10 testimony which have been designated "confidential" or "highly confidential pursuant to the Stipulated
11 Protective Order governing this litigation [Dkt. 306, June 18, 2008] ("Stipulated Protective Order"). The
12 confidential/highly confidential designations were made by certain defendants in this litigation.

13 4. The Stipulated Protective Order requires that a party may not file any confidential
14 material in the public record. Stipulated Protective Order at ¶ 10. The Stipulated Protective Order
15 further provides that any party seeking to file any confidential material under seal must comply with
16 Civil Local Rule 79-5. Stipulated Protective Order at ¶¶ 1, 10.

17 5. The FAC contains such material. Accordingly, pursuant to Local Rule 79-5(e), Plaintiffs
18 seek to submit this material under seal in good faith in order to comply with the Stipulated Protective
19 Order and the applicable Local Rules.

20 6. Therefore, Plaintiffs respectfully request an order sealing portions of Plaintiffs' FAC.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th
22 day of June, 2015 at San Francisco, California.

23 /s/ Sylvie K. Kern

24 Sylvie K. Kern